

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
PAMELA DAVIS	:	VIOLATIONS:
TONY VILLANUEVA,	:	18 U.S.C. § 1343 (wire fraud - 6 counts)
a/k/a “Antonio Villanueva,”	:	18 U.S.C. § 1956 (money laundering - 3
a/k/a “Antonio	:	counts)
Ramon Villanueva”	:	18 U.S.C. § 1957 (money laundering - 3
	:	counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notices of forfeiture
	:	

INDICTMENT

COUNTS ONE THROUGH SIX

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant PAMELA DAVIS was employed by GlaxoSmithKline (“GSK”), located in Philadelphia, Pennsylvania, as an Accounts Payable Technical Analyst with authority to process payments to vendors who had been previously approved by GSK officials and that rendered services to GSK.
2. Defendant TONY VILLANUEVA was the owner of three limousine companies incorporated in North Carolina and titled Odyssey Enterprize Transportation (“ODYSSEY”), Empire Luxury Transportation (“EMPIRE”), and TTG International (“TTG”).

3. Defendant TONY VILLANUEVA was the signatory and owner of three Wachovia bank accounts located in North Carolina. These accounts were: Odyssey Enterprize Transportation, account number ending in last four digits 5870; Empire Luxury Transportation, account number ending in last four digits 1468; and TTG International, account number ending in last four digits 6868.

4. Defendant TONY VILLANUEVA was the signatory and owner of two personal bank accounts and two business bank accounts with RBC Centura Bank located in North Carolina. These accounts were: Odyssey Enterprize Transportation, account number ending in last four digits 3850; Odyssey Enterprize Transportation, account number ending in last four digits 3842; Antonio Villanueva, account number ending in last four digits 5076; and Antonio Villanueva, account number ending in last four digits 5041.

THE SCHEME

5. From on or about June 21, 2006 to on or about November 13, 2006, defendants

**PAMELA DAVIS and
TONY VILLANUEVA
a/k/a “Antonio Villanueva,”
a/k/a “Antonio Ramon Villanueva”**

devised and intended to devise a scheme to defraud GSK, and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

6. Defendant PAMELA DAVIS exceeded her authority as an Accounts Payable Technical Analyst by establishing an account in the name of Empire Luxury Transportation in GSK's data base, and exceeded her authority in initiating and making fraudulent payments to ODYSSEY and EMPIRE.

7. Defendant PAMELA DAVIS processed payments from GSK located in Philadelphia, Pennsylvania to defendant TONY VILLANUEVA's Wachovia EMPIRE and ODYSSEY accounts, located in Research Triangle Park, North Carolina for purported transportation services rendered to GSK, though she knew no such services were provided.

8. Defendant TONY VILLANUEVA provided no transportation services to GSK warranting the payments processed by defendant PAMELA DAVIS.

9. Defendant TONY VILLANUEVA received, transferred and spent the monies derived from these payments knowing he did not provide any transportation services for those payments.

10. Defendants PAMELA DAVIS and TONY VILLANUEVA defrauded GSK of approximately \$677,676.34.

11. On or about each of the dates set forth below, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**PAMELA DAVIS and
TONY VILLANUEVA
a/k/a "Antonio Villanueva,"
a/k/a "Antonio Ramon Villanueva",**

for the purpose of executing the scheme described above, and attempting to do so, and aiding and abetting its execution, caused to be transmitted by means of wire communication in interstate

commerce the signals and sounds described below for each count, each transmission constituting a separate count:

COUNT	DATE	DESCRIPTION
ONE	8/09/2006	Wire Transfer from Philadelphia, Pennsylvania to Wachovia Odyssey Enterprize Transportation account ending in last four digits 5870 located in Research Triangle Park, NC in the amount of \$6523.12.
TWO	9/12/2006	Wire Transfer from Philadelphia, Pennsylvania to Wachovia Empire Luxury Transportation account ending in last four digits 1468 located in Research Triangle Park, NC in the amount of \$5570.20.
THREE	9/21/2006	Wire Transfer from Philadelphia, Pennsylvania to Wachovia Odyssey Enterprize Transportation account ending in last four digits 5870 located in Research Triangle Park, NC in the amount of \$6755.33.
FOUR	10/04/2006	Wire Transfer from Philadelphia, Pennsylvania to Wachovia Empire Luxury Transportation account ending in last four digits 1468 located in Research Triangle Park, NC the amount of \$74,982.98.
FIVE	10/19/2006	Wire Transfer from Philadelphia, Pennsylvania to Wachovia Empire Luxury Transportation account ending in last four digits 1468 located in Research Triangle Park, NC in the amount of \$161,581.17.
SIX	11/13/2006	Wire Transfer from Philadelphia, Pennsylvania to Wachovia Empire Luxury Transportation account ending in last four digits 1468 located in Research Triangle Park, NC in the amount of \$378,827.42.

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS SEVEN THROUGH NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 10 of Counts One through Six are incorporated here.
2. Defendant TONY VILLANUEVA received fraudulent payments from GSK located in Philadelphia, PA into to his Wachovia Odyssey Enterprize Transportation and Empire Luxury Transportation accounts located in Research Triangle Park, NC.
3. Defendant TONY VILLANUEVA transferred monies received from GSK to his other business and personal accounts held with Wachovia Bank located in North Carolina and RBC Centura Bank located in North Carolina.
4. On or about the dates set forth below, defendant

**TONY VILLANUEVA
a/k/a “Antonio Villanueva,”
a/k/a “Antonio Ramon Villanueva”**

knowingly conducted, and willfully caused, the following financial transactions affecting interstate commerce:

COUNT	DATE	DESCRIPTION
SEVEN	11/13/2006	\$132,212.50 Counter Deposit to Wachovia account titled TTG International Transportation, number ending in last four digits 6868.

EIGHT	11/13/2006	\$132,212.50 Counter Deposit to Wachovia account titled Odyssey Enterprize Transportation, number ending in last four digits 5870.
NINE	11/27/2007	\$140,000.00 Official Wachovia Bank Check, dated 11/15/2006, payable to Tony Villanueva, Deposited into RBC Centura account titled Antonio Villanueva, number ending in last four digits 5076, memo line reads, "TTG International".

5. When conducting, and willfully causing, the financial transactions described in paragraph 4 above, defendant TONY VILLANUEVA knew that the property involved in those financial transactions represented the proceeds of some form of unlawful activity.

6. The financial transactions described in paragraph 4 above involved the proceeds of a specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, and defendant TONY VILLANUEVA acted with the knowledge that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNTS TEN THROUGH TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Counts Seven through Nine are incorporated here.

2. On or about the dates set forth below, defendant

TONY VILLANUEVA
a/k/a “Antonio Villanueva,”
a/k/a “Antonio Ramon Villanueva”

knowingly engaged in, and willfully caused, a monetary transaction affecting interstate commerce in criminally derived property of a value greater than \$10,000, described more fully below, and such property was derived from a specified unlawful activity, that is wire fraud in violation of 18 U.S.C. § 1343:

COUNT	DATE	DESCRIPTION
TEN	10/19/2006	\$65,000.00 Counter Deposit to Wachovia account titled TTG International Transportation, number ending in last four digits 6868.
ELEVEN	10/19/2006	\$65,000.00 Counter Deposit to Wachovia account titled Odyssey Enterprize Transportation, number ending in last four digits 5870.

TWELVE	11/16/2006	\$71,562.35 Transfer to Wachovia account titled TTG International Transportation, number ending in last four digits 6868.
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All in violation of Title 18, United States Code, Sections 1957.

NOTICE OF FORFEITURE ONE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1956 and 1957 set forth in this indictment, defendants

**PAMELA DAVIS and
TONY VILLANUEVA
a/k/a “Antonio Villanueva,”
a/k/a “Antonio Ramon Villanueva”**

shall forfeit to the United States of America any and all property involved in such offenses, and any property traceable to such property, including, but not limited to, the sum of \$88,594.61, and

a) 1998 International Mid-Bus Conversion (3000 Series 34) Vehicle
Identification Number 1HVBEABM8WH641174.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982.

NOTICE OF FORFEITURE TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1343 set forth in this indictment, defendants

**PAMELA DAVIS and
TONY VILLANUEVA
a/k/a “Antonio Villanueva,”
a/k/a “Antonio Ramon Villanueva”**

shall forfeit to the United States of America any and all property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense, including but limited to the sum of \$88,594.61, and

I) 1998 International Mid-Bus Conversion (3000 Series 34) Vehicle
Identification Number 1HVB EABM8WH641174.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**